

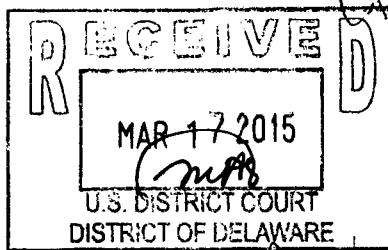
IN the United States District Court for
District of Delaware

De-Shawn Drummond

Pro se Plaintiff

CA. NO 14-1135-GMS

V
SGT William Kischel



MOTION FOR APPOINTMENT OF
COUNSEL

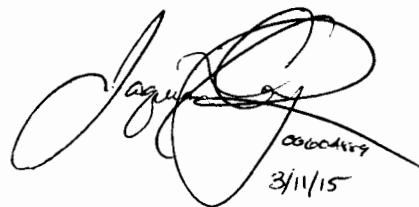
1. Plaintiff is a Pro se litigant
2. Plaintiff has stated a claim in which relief can be granted
3. Plaintiff submits Affidavits of witnesses in which become genuine factual material that exists
4. Plaintiff has a 9th Grade Education
5. Plaintiff is a Active litigant in 7 Case in U.S. DC. 1 in J.P. 4
6. in Family Court is a Advocate Against Solitary Confinement.

D. Drago on
#365566

100-108

Date: March 11th, 2015

I, Jaguan Crump 08604889, have witnessed on multiple occasions that Sgt. William Kushel, during pat and frisk searches, has been inappropriately sexual in his proceedings of such. He often rubs the chest, waist and inner thigh/leg areas slowly and pervertedly. Showing extra "care" to the nipple area, lower back and inner thighs near the genital area. I haven't ever allowed him to pat and frisk me because he has a reputation of doing these homosexual things to inmates. Both inmates and Correctional officers know this about him. However, the issue is never ~~ever~~ resolved and Sgt. Kushel continues to laugh about his perverted homosexual behavior with other C/o's and Lt.'s in the buildings he works. I've been told by multiple inmates of his behavior, seen his behavior with my own eyes on several occasions leaving the building 24 A and B chowhalls and have witnessed multiple inmates file grievances and verbally complain about his conduct during pat and frisk searches.



Jaguan Crump
3/11/15

Certificate of Service

I, DeShawn Dringo SR hereby certify that I have served a true and correct cop(ies) of the attached Motion(AOC), Reply to Complaint & TRO Upon the following parties/persons:

To: U.S. Dist.
844 N. King Street
Wilmington, DE
19801

To: Stuart Dowdritz
820 N. French St
Wilmington, DE
19801

To: _____

To: _____

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the James T. Vaughn Correctional Center, Smyrna, DE 19977.

On this 15 day of March, 20 15

